

FILED NOV 21 15:07 2021 USDC-OR

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

THE GRAND JURY CHARGES:

COUNT 1
(Destruction of Government Property)
(18 U.S.C. § 1361)

On or about July 17, 2021, in the District of Oregon, defendant ELLY AMBER STARLING willfully damaged and destroyed property owned by the United States, that is, an upper window located on the east side stairwell of the Immigration and Customs Enforcement facility in Portland, Oregon, which value exceeds \$1000;

In violation of Title 18, United States Code, Section 1361.

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COUNT 2
(Destruction of Government Property)
(18 U.S.C. § 1361)

On or about July 17, 2021, in the District of Oregon, defendant ELLY AMBER STARLING willfully damaged and destroyed property owned by the United States, that is, a lower window located on the east side stairwell of the Immigration and Customs Enforcement facility in Portland, Oregon, which value exceeds \$1000;

In violation of Title 18, United States Code, Section 1361.

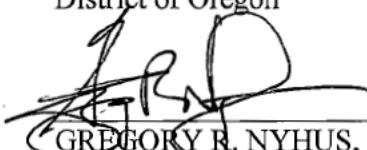
DATED: November 2, 2021.

A TRUE BILL.

[REDACTED]
OFFICIATING FOREPERSON

Presented by:

SCOTT ERIK ASPHAUG, OSB #833674
Acting United States Attorney
District of Oregon



GREGORY B. NYHUS, OSB #913841
Assistant United States Attorney